

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA**

LINDA BEDELL, THE LINDA BEDELL
INDIVIDUAL RETIREMENT ACCOUNT,
LONDON BEDELL, KEATON BEDELL, and
INNER DESIGN, INC. PROFIT SHARING
PLAN,

Plaintiffs,

V.

GEORGE HECKLER, MARK S. CARROW,
CASSATT SHORT TERM TRADING FUND LP,
CV SPECIAL OPPORTUNITIES FUND, LP,
CITRIN COOPERMAN & COMPANY, LLP,
TOPWATER INVESTMENT MANAGEMENT
LLC, and GREEN MOUNTAIN FUND, LLC,

Defendants.

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Civil Action No.: 2:20-cv-3804-WB

**PLAINTIFFS' RESPONSE TO DEFENDANTS TOPWATER INVESTMENT
MANAGEMENT LLC AND GREEN MOUNTAIN EXCLUSIVE FUND, LLC'S
MOTION TO SET ASIDE DEFAULTS**

Plaintiffs Linda Bedell, the Linda Bedell Individual Retirement Account, Landon Bedell, Keaton Bedell, and Inner Design, Inc. Profit Sharing Plan (“Plaintiffs”) were duly served with Defendants Topwater Investment Management LLC and Green Mountain Exclusive Fund, LLC’s (“Defendants”) Motion to Set Aside Defaults (the “Motion”), filed with this Court on December 28, 2021. Plaintiffs hereby state that they take no position on Defendants’ Motion.

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/s/ Ira Neil Richards

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Dated: January 12, 2022